

To: Hon. Paul G. Gardephe, U.S.D.J. - SDNY

500 Pearl Street

Manhattan, NY 10007

From: Brandon Green Reg. No. 56400-054

Defendant, Pro Se

MDC - Brooklyn P.O. Box 329002

Brooklyn, New York 11232

cc: AUSA Jessica Feinstein

Re: Case No. 16 Cr. 281-002 (PGG)

Date: February 3, 2021

NOTICE OF INTENT TO REPLY TO GOVERNMENT'S
LETTER OPPOSING DEFENDANT'S POST-CONVICTION BAIL APPLICATION

Your Honor:

I would first like to thank this Court for its time. I am submitting this Notice to apprise this Court, and the Government, of my Intent to submit a reply to their recent letter opposing my post-conviction bail application (hereafter "Government's Letter Opposing Bail"). I ask this Court please take notice of this and hold off ruling on my bail application until my response has been reviewed and submitted with this Court. Also, I would like for this Court to note that I intend on submitting, along with this response, my "Signed" "Attorney-Client Privilege Waiver Form", along with my "Affidavit of Facts" supporting my post-conviction claims, with a supporting Petition to redress my grievances with this Court regarding said claims. Moreover, I feel that it is necessary for this Court to first review these documents before ruling on my bail request, as all these things coincide with each other: i.e., the Affidavit of Facts and supporting petition establish a reasonable probability that relief will be granted in my favor regarding my post-conviction claims, and this supports my application for bail pending before this Court.

Therefore, until this Court first receives, reviews, and files the aforementioned documents that I'll soon be submitting, I respectfully ask this Court to hold off ruling on my pending bail application.

If there are any questions, comments, or concerns, I ask that you, and/or the Government, can please contact me by writing me at the address above, or phoning me at the institution.

Again, I would like to thank this Court for its time. Have a wonderful day.

Best Regards,

Brandon Green Reg. # 56400-054

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